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October 30, 2006

BY HAND AND FACSIMILE

Ms. Marianne Abely
Office of General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20004

Re: In re Bank of America Corporation (MUR 5849)

Dear Ms. Abely:

As you know, we are representing Bank of America Corporation (the "Bank") in connection with the above-captioned matter under review. We received on October 26, 2006 the Commission's October 24, 2006 letter notifying us of its reason to believe finding against the Bank. Accordingly, the Bank's response would ordinarily be due on November 10, 2006. As I indicated during our telephone conversation last Thursday, we request that the staff grant us an extension of 14 days within which to file a response. If this extension is granted, the Bank's response would be due on November 24, 2006.

In view of the fact that the Commission issued the reason to believe letter just before the national election, we are currently engaged in providing Federal Election Campaign Act compliance advice to numerous participants in the federal election process. In addition, we are currently preparing for an election-related trial scheduled to begin in early December 2006. For these reasons, we require the 14-day extension.

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OFFICE OF
GENERAL COUNSEL
FEDERAL ELECTION COMMISSION

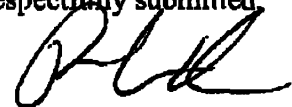
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If you have any questions, please feel free to contact me at (202) 662-5503.

Respectfully submitted,



Robert K. Kelner

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